

BEFORE THE
POSTAL REGULATORY COMMISSION
WASHINGTON, D.C. 20268

POST OFFICE STRUCTURE PLAN

Docket No. N2012-2

**UNITED STATES POSTAL SERVICE RESPONSES TO DAVID B. POPKIN
INTERROGATORIES (DBP/USPS-26—30)**
(July 5, 2012)

The United States Postal Service today files its institutional responses to the above-identified interrogatories of David B. Popkin, dated June 28, 2012. Each interrogatory is stated verbatim and followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE
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**UNITED STATES POSTAL SERVICE
RESPONSE TO DAVID B. POPKIN INTERROGATORY**

DBP/USPS-26 Please refer to your response to Interrogatory DBP/USPS-16. Your response appears to indicate that all service complaints must be filed with the 1-800-ASK-USPS telephone system.

[a] Are customers permitted to make their complaint or inquiry directly to the local facility?

[b] Are customers permitted to make their complaint or inquiry up the USPS “chain of command”?

[c] Are customers permitted to make their complaint or inquiry directly to the Postal Regulatory Commission?

[d] Are customers permitted to make their complaint or inquiry to a non-USPS individual or entity?

[e] If the response to any or all of subparts [a] through [d] is not an unqualified yes, please respond to the original interrogatory.

RESPONSE

[a-e] The Postal Service imposes no restriction on a customer’s freedom to direct a complaint to a particular person or organization. This situation will not change as a result of POSTPlan. The Postal Service has developed 1-800-ASK-USPS® (1-800-275-8777) as a customer service tool and an outlet for customer complaints.

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DBP/USPS-27 Please refer to your response to Interrogatory DBP/USPS-18. Please confirm, or explain if you are unable to confirm, that the Postal Service has not implemented any procedure where carriers from one independent post office have been transferred to another independent post office and/or where the supervision of one independent post office has been transferred to another independent office where both independent offices are EAS Level 18 or above.

RESPONSE

Not confirmed. The Postal Service currently has guidelines in place for the transfer of delivery services from one Post Office to another Post Office, known as Delivery Unit Optimization (DUO). However, the Postal Service is not aware of any instances where delivery for an EAS Level 18 or above Post Office was transferred to another EAS Level 18 or above Post Office as described in this Interrogatory. Further, the Postal Service currently has guidelines in place for the conversion of a Post Office to a station or branch. Please see Handbook PO-101 (Library Reference No. 5 (USPS-LR-N2012-2/5)). Neither set of guidelines has restrictions specifically based on Post Office level.

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DBP/USPS-28 Please refer to your response to Interrogatory DBP/USPS-22 subpart [b].

Please provide details on the “other solutions” that are being considered for implementation.

RESPONSE

With respect to access to Post Office Boxes, in addition to changes made the Post Office Box lobbies, the reference to “other solutions” includes, but is not limited to, cluster box units or alternate access locations, such as contractor-operated units operating in a community in addition to an RMPO or PTPO.

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DBP/USPS-29 Please refer to your response to Interrogatories DBP/USPS-19 , 20, 21, and 24.

[a] Please confirm or explain that these added duties may be required to be performed at the RMPO/PTPO location.

[b] Please confirm or explain that these added duties may be required to be performed by an individual other than the “normally” assigned RMPO/PTPO employee.

[c] Please confirm or explain that there may be travel time for the APO employee to travel to the RMPO/PTPO location.

[d] Will that employee be “on the clock” while travelling from the APO to the RMPO/PTPO location?

[e] Please explain why the Postal Service cannot increase the retail time to allow for all of the necessary functions?

RESPONSE

[a] Confirmed.

[b] Confirmed.

[c] Confirmed.

[d] Currently, in such situations, it is likely that the mail is not transported by the Postmaster, but by a contract employee, for example, as part of a highway contract route. Compensation for a contract employee depends on the terms of his or her contract. That system will remain in place under POStPlan.

[e] The Postal Service has determined that POStPlan presents an effective method of performing the responsibilities referenced in this interrogatory.

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DBP/USPS-30 Please refer to your response to Interrogatory DBP/USPS-17. Please confirm, or explain if you are unable to confirm, that the Postal Service is unable to provide any rational reason that a knowledgeable survey respondent could believe it would be the best choice to have an office close and not provide any service in a given area as opposed to having some level of service available.

RESPONSE

Not confirmed. The survey did not ask respondents to provide the rationale for their indicated preferences. As such, any response to this interrogatory, or related interrogatories, would necessarily require the Postal Service to speculate as to a particular respondent's rationale. The Postal Service's effort to avoid such speculation, however, does not mean that respondents did not have a rational reason for their preference.